

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHRISTINE MARIE POMPEI Debtor	:	CHAPTER 13
	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CHRISTINE MARIE POMPEI	:	
Respondent	:	CASE NO. 1-24-bk-00746

TRUSTEE’S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 15th day of May 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)’ plan for the following reason(s):

1. Debtor(s)’ plan violates 11 U.S.C. § 1322(a)(2) in that the debtor(s) has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507 (estimated for 2020, 2021 and 2022).
2. The Trustee avers that debtor(s)’ plan is not feasible based upon the following:
 - a. The plan is underfunded relative to claims to be paid – 100% plan.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 15th day of May 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

PAUL MURPHY-AHLES ESQUIRE
DETHLEFS, PYKOSH & MURPHY
2132 MARKET STREET
CAMP HILL, PA 17011-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee